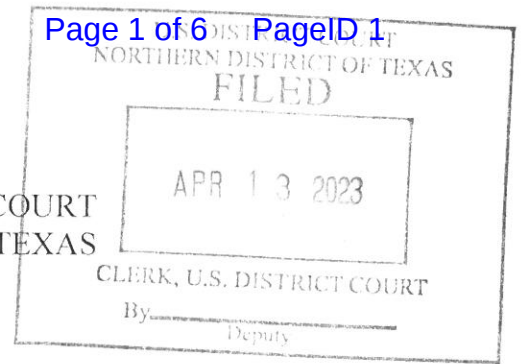


IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION



UNITED STATES OF AMERICA

v.

Case No. 4:23-MJ- 290

ALEXANDER THOMAS (01)  
XAVERONE THOMAS (02)  
KEOSHA JONES (03)

**CRIMINAL COMPLAINT**

I, Derreck Dean, being duly sworn, state the following is true and correct to the best of my knowledge and belief, but is not inclusive of all the evidence or information in the case:

**Alleged Offense:**

On or about April 12, 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendants **Alexander Thomas, Xaverone Thomas, and Keosha Jones**, along with others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Fentanyl, a Schedule II controlled substance, in violation of 21 U.S.C. § 846.

**Probable Cause:**

1. I am an "investigative or law enforcement officer of the United States" within the meaning of 18 U.S.C. § 3061. I am currently assigned as a Task Force Officer with the Drug Enforcement Administration in Fort Worth, Texas. This complaint is based on the following facts:

2. On February 08, 2023, The Tarrant County Sheriff's Office (TCSO) Combined Narcotics Enforcement Team (CNET) obtained a State of Texas Search Warrant for the address of 6612 Brentwood Stair Road, Unit A, Fort Worth, Tarrant County, Texas (hereinafter Unit A).

3. On February 10, 2023, CNET and The TCSO Tactical Team executed the search warrant on Unit A. After the location was entered and deemed safe, Agents/Officers were notified that multiple individuals were detained inside Unit A. Agents/Officers then entered the suspected location and processed the scene. During the search of Unit A, Agents/Officers located and seized approximately 367 grams of crystal methamphetamine, 233.9 grams of cocaine, 40.6 grams of heroin, 16.9 grams of fentanyl and four firearms. Through information received during the search and subsequent investigation, Investigators determined **Alexander Thomas** was one of the individuals who controls the location and responsible for the aforementioned narcotics being distributed from Unit A.

4. Furthermore, during the execution of the aforementioned narcotics search warrant at Unit A, Agents/Officers received intelligence from a Source of Information (SOI) regarding **Alexander Thomas** being the controller of and responsible for the narcotics being sold out of the front section of Unit A. In April of 2023, Agents/Officers also received information from a Cooperating Defendant (CD) regarding **Alexander Thomas** distributing narcotics from Unit A.

5. During subsequent investigation after the execution of the initial state search warrant in February, Agents/Officers conducted surveillance of **Alexander Thomas** and other known and unknown coconspirators in attempts to identify individuals, vehicles, and additional locations used by and associated with the **DTO** and to further identify additional stash locations, and methods of transporting illegal drugs and its proceeds. On multiple occasions, **Alexander Thomas** and vehicles that **Alexander Thomas** has been known to operate, have been observed going and coming from his residence located on Willie Street in Fort Worth, Texas during all hours of the day and night. **Alexander Thomas** was also observed leaving his residence and traveling to Units A & B of 6612 Brentwood Stair Road, which are locations from which **Alexander Thomas** and other known and unknown co-conspirators are known to distribute illegal drugs.

6. On April 10, 2023, Agents/Officers obtained a Federal Search Warrant for Units A, B, & C of 6612 Brentwood Stair Road, Fort Worth, Tarrant County, Texas as well as **Alexander Thomas's** residence located on Willie Street in Fort Worth, Tarrant County, Texas.

7. On April 12, 2023, Agents/Officers executed the search warrants on Units A, B, & C. After the locations were entered and deemed safe, Agents/Officers were notified that **Keosha Jones** was detained inside Unit A, in which **Jones** was the sole occupant of the rear portion of Unit A, **Alexander Thomas** was detained inside his red Dodge Charger parked in front of Unit B, in which he the sole occupant of the vehicle, and **Xaverone Thomas** was detained inside Unit B. Agents/Officers then entered the suspected locations and processed the scene.

8. During the search of Unit A, where **Keosha Jones** was located, Agents/Officers located and seized approximately 40 grams of suspected cocaine, 33 grams of “M-30” pills, which tested positive for the presence of Fentanyl, 33 grams of crystal methamphetamine, which tested positive for the presence of methamphetamine, 62 grams of heroin, numerous other substance that have not been identified at this time, and 1 firearm.

9. During the search of Unit B, where **Xaverone Thomas** was located, Agents/Officers located approximately 219 grams of “M-30” pills, which tested positive for the presence of Fentanyl, 106 grams of Adderall pills, and 4 firearms.

10. During a custodial interview of **Keosha Jones**, **Jones** stated she was present at Unit A due to her being paid by **Alexander Thomas** to clean the location. It should be noted that the distributable amounts of cocaine, “M-30” Fentanyl pills, and crystal methamphetamine were located inside of **Jones’s** purse, which contained **Jones’s** identification card. **Jones** stated she put the aforementioned narcotics in her purse due to a past incident where she got in trouble with **Alexander Thomas** for narcotics coming up missing while she was cleaning the location. Furthermore, **Jones** stated **Alexander Thomas** and **Xaverone Thomas** participate in the illegal sales of narcotics from Unit A and Unit B. Lastly, **Jones** stated the narcotics located in her purse and throughout Unit A belong to **Alexander Thomas** and **Xaverone Thomas**.

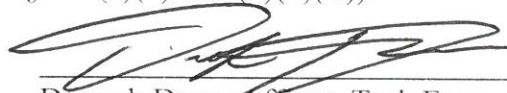
11. During a custodial interview of **Alexander Thomas**, **Alexander Thomas** stated he was present at Units A, B, & C due to distributing paperwork regarding individuals renting the aforementioned Units. **Alexander Thomas** stated he works at the Units



assisting the property manager. **Alexander Thomas** stated he had no knowledge of drugs at the locations nor drugs being sold from the locations. Furthermore, **Alexander Thomas** stated he lives at a residence on Willie Street in Fort Worth, Texas. It should be noted that during the execution of the search warrant on **Alexander Thomas's** residence on Willie Street, also on April 12, 2023, Agents/Officers located approximately 50 grams of "M-30" pills, which tested positive for the presence of Fentanyl, 183 grams of Adderall pills, and multiple firearms, which is consistent with the evidence located at Units A & B.

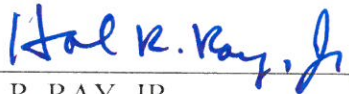
12. During a custodial interview of **Xaverone Thomas**, **Xaverone Thomas** stated he was present at the location to just hang out with his brother **Alexander**. **Xaverone Thomas** stated he had no knowledge of drugs at the locations nor drugs being sold from the locations. It should be noted that during the execution of the search warrant, **Xaverone Thomas** was located in the front area of Unit B, which is where the narcotics were located. Furthermore, a loaded firearm was located in close proximity of **Xaveron Thomas** and the aforementioned narcotics. Lastly, during the search of Unit B, Agents/Officers located multiple scales bearing drug residue and several different types of narcotics packaged separately in distributable amounts. Through training and experience as narcotics investigators, Agents/Officers know this can be indicative of narcotics trafficking.

13. Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated above establish probable cause that **Alexander Thomas, Xaverone Thomas,** and **Keosha Jones**, conspired together to possess with intent to distribute Fentanyl, in violation of 21 U.S.C. § 846 (21 U.S.C. § 841(a)(1) and (b)(1)(C)).



Derreck Dean, Affiant, Task Force Officer  
Drug Enforcement Administration

Sworn to before me, and subscribed in my presence on this 13<sup>th</sup> day of April, 2023, at 10:32 a.m./p.m., in Fort Worth, Texas.



HAL R. RAY, JR.  
UNITED STATES MAGISTRATE JUDGE